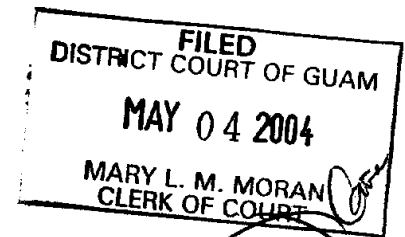


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DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**EX PARTE MOTION TO
RECONSIDER ORDER DENYING
MOTION TO STAY ALL
DEPOSITIONS PENDING
DETERMINATION OF ITS MOTION
TO STRIKE FIRST AMENDED
COMPLAINT IN WHOLE OR IN
PART OR, IN THE ALTERNATIVE,
MOTION TO DISMISS THE THIRD
AND SIXTH CAUSES OF ACTION
AND FOR SANCTIONS**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagatna, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order to Stay All Depositions based on HSBC's Ex Parte Motion to Reconsider the Order Denying its Motion to Stay All Depositions Pending its Motion to Strike First Amended Complaint filed herein on April 27, 2004, in whole or in part and for sanctions or, in the alternative, dismissing the Third and Sixth Causes of action in the First Amended Complaint, pursuant to Rules 54(b), 59(e) and 26(f), of the Federal Rules of Civil Procedure, as more fully explained in the Memorandum of Points and Authorities contemporaneously filed herein.

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.
Civil Case No. 03-00036

Ex Parte Motion to Reconsider Order Denying Motion to Stay All Depositions Pending Determination of its Motion to Strike First Amended Complaint in Whole or in Part or, in the Alternative, Motion to Dismiss Third and Sixth Causes of Action and For Sanctions

Page 2 of 2

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 4th day of May, 2004.

LAW OFFICES OF BRONZE & TANG
A Professional Corporation

By: _____


JACQUES G. BRONZE